



## BUCKEYE CARIBBEAN TERMINALS, LLC

*Celebrating 125 Years of Service*  
1886 - 2011

February 26, 2014

Carrier 901 Km 2.7  
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Yabucoa, Puerto Rico 00767-0186  
Tel (787) 893-2424  
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**CERTIFIED MAIL # 7012 1010 0000 7644 2467**  
**RETURN RECEIPT REQUESTED**

Ms. Kate Anderson  
Chief Clean Water Regulatory Branch  
Division of Environmental Planning and Protection  
U.S. Environmental Protection Agency, Region 2  
290 Broadway  
New York, New York 10007-1866

**RE: NPDES Permit Application Additional Information**  
**NPDES Permit Application No. PR0000400**  
**Buckeye Caribbean Terminals LLC.**  
**Yabucoa, Puerto Rico**

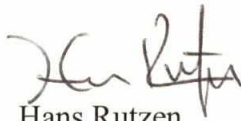
Dear Ms. Anderson:

Enclosed please find the revised NPDES Application Form 2-F for outfall 002, which EPA requested from Buckeye to correct after the February 11, 2014 revisions. The corrections were made to Section IV-C as the narrative provided in the February 11, 2014 submittal is different from the June, 2013 revised application. We have replaced the narrative included in the February 11, 2014 submission with the statements provided in the June 2013 revised application. The following is a description of the revised document that supersedes the corresponding attachment included in the June 19, 2013 submission:

- Attachment 6: Revised Form 2F for Outfall 002 signed on February 26, 2014

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Cordially,

A handwritten signature in dark ink, appearing to read 'Hans Rutzen', is positioned above the printed name.

Hans Rutzen  
Operations Director  
Buckeye Caribbean Terminals LLC

Enclosure

c: Ms. Wanda Garcia

Director, Water Quality Area, Puerto Rico Environmental Quality Board  
Certified Mail No. 7012 1010 0000 7644 2481

Ms. Annette Feliberty Ruiz

Point Source Permit Division, Puerto Rico Environmental Quality Board  
Certified Mail No. 7012 1010 0000 7644 2474

Ms. Teresita Rodríguez

Chief, Multimedia Permits and Compliance Branch  
Caribbean Environmental Protection Agency, Region 2  
Certified Mail No. 7012 1010 0000 7644 2498

[illegible]

**Buckeye Caribbean Terminals LLC**

NPDES Permit Application No. PR0000400

Attachment 6

Form 2F for Outfall 002



Continued from the Front

#### IV. Narrative Description of Pollutant Sources

A. For each outfall, provide an estimate of the area (include units) of impervious surfaces (including paved areas and building roofs) drained to the outfall, and an estimate of the total surface area drained by the outfall.

Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)	Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)
002	46.7 acres	58.4 acres			

B. Provide a narrative description of significant materials that are currently or in the past three years have been treated, stored or disposed in a manner to allow exposure to storm water; method of treatment, storage, or disposal; past and present materials management practices employed to minimize contact by these materials with storm water runoff; materials loading and access areas, and the location, manner, and frequency in which pesticides, herbicides, soil conditioners, and fertilizers are applied.


No significant materials are stored or managed on Outfall 002 drainage areas. Proper management in this area focuses on the removal of accumulated debris in the channels and leaf retention structures and sediment traps to reduce solids reaching the Flood Control Pond (FCP). Implementation of a SWPPP (Attachment 10, Section 5.0). Only herbicides are applied at a frequency of 3 months at perimeter fence, tanks and docks pipe rack, main substation yard and around basins using spraying method on sunny days, and per manufacturer recommendation by a licensed technician.

C. For each outfall, provide the location and a description of existing structural and nonstructural control measures to reduce pollutants in storm water runoff; and a description of the treatment the storm water receives, including the schedule and type of maintenance for control and treatment measures and the ultimate disposal of any solid or fluid wastes other than by discharge.

Outfall Number	Treatment	List Codes from Table 2F-1
002	Under normal conditions runoff of non contact areas of Outfall 002 are received by the East and West Channels that drain into the FCP. These channels have sediment traps and gabions to retain solids and promotes oxygenation. Leaf retention structures and retention basins are installed in erosion prone areas to reduce TSS reaching the FCP. See Attachment 10 (A-3) for structural control locations. The schedule and type of maintenance is describe on SWPPP as part of Operation & Maintenance Inspections. Sediments inside sediment traps and vegetative materials are collected by Allied Waste and disposed as non-hazardous materials in the Ponce Industrial Landfill.	1-T 4-A

#### V. Nonstormwater Discharges

A. I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of nonstormwater discharges, and that all nonstormwater discharged from these outfall(s) are identified in either an accompanying Form 2C or Form 2E application for the outfall.

Name and Official Title (type or print)	Signature	Date Signed
Hans Rutzen, Operations Director		FEB/26/2014

B. Provide a description of the method used, the date of any testing, and the onsite drainage points that were directly observed during a test.

Eng. Robert Beato from the environmental consulting firm ERM conducted a visual inspection detecting dry weather discharges in 2008. Repeated the study in 2012. No dry weather discharges observed. In addition, a Conceptual Engineering report was developed (Refer to Attachment 16 for visual inspection certification and Attachment 18 for the Conceptual Engineering Report).

#### VI. Significant Leaks or Spills

Provide existing information regarding the history of significant leaks or spills of toxic or hazardous pollutants at the facility in the last three years, including the approximate date and location of the spill or leak, and the type and amount of material released.

No significant spills or leaks in the last three years.

Continued from Page 2

EPA ID Number (copy from Item 1 of Form 1)  
110000580915 - Outfall 002**VII. Discharge Information**

A, B, C, & D: See instructions before proceeding. Complete one set of tables for each outfall. Annotate the outfall number in the space provided.  
Table VII-A, VII-B, VII-C are included on separate sheets numbers VII-1 and VII-2.

E. Potential discharges not covered by analysis – is any toxic pollutant listed in table 2F-2, 2F-3, or 2F-4, a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ Yes (list all such pollutants below)☒ No (go to Section IX)**VIII. Biological Toxicity Testing Data**

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☐ Yes (list all such pollutants below)☒ No (go to Section IX)**IX. Contract Analysis Information**

Were any of the analyses reported in Item VII performed by a contract laboratory or consulting firm?

☒ Yes (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)☐ No (go to Section X)

A. Name	B. Address	C. Area Code & Phone No.	D. Pollutants Analyzed
Environmental Quality Laboratories	PO Box 11485 San Juan PR 00910-1485	(787) 288-2840	All parameters on this application

**X. Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

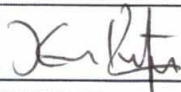
A. Name & Official Title (Type Or Print)

Hans Rutzen, Operations Director

B. Area Code and Phone No.

(787) 893-2424

C. Signature



D. Date Signed

FEB/26/2014



Part A – You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

Part B – List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Continue on Reverse

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number <i>(if available)</i>	Maximum Values <i>(include units)</i>		Average Values <i>(include units)</i>		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
	30 PtCo	30 PtCo			1.00	color (Soil)
	10.9 mg/l	9.9 mg/l			1.00	TOC (Soil/Debris)
7664-41-7	<0.05 mg/l	0.06 mg/l			1.00	Ammonia (Debris) (Note 2)
	0.12 mg/l	0.12 mg/l			1.00	residual chlorine (Clean & Wash)
71-43-2	<0.3 ug/l	<0.3 ug/l			1.00	benzene (Note 1)
100-41-4	<0.2 ug/l	<0.2 ug/l			1.00	ethylbenzene (Note 1)
108-88-3	<0.2 ug/l	<0.2 ug/l			1.00	toluene (Note 1)
	<0.5 ug/l	<0.5 ug/l			1.00	meta-para xylenes (Note 1)
95-47-6	<0.2 ug/l	<0.2 ug/l			1.00	o xylenes (Note 1)
						Note 1 - Results for these parameter
						were not detected.
						Sample for screening purpose only.
						Note 2 - Results for these parameter
						were below detectable limit.
						Sample for screening purpose only.

Part D – Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event (in minutes)	3. Total rainfall during storm event (in inches)	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event (gallons/minute or specify units)	6. Total flow from rain event (gallons or specify units)
12/08/10	400 min	2.86 in	267 h	4,309 gpm	1,810,000 gal
5/02/11	300 min	0.80 in	96 h	100 gpm recirculating	no discharge
8/21/12	30 min	0.62 in	72 h	100 gpm recirculating	no discharge

7. Provide a description of the method of flow measurement or estimate.

December 8, 2010 - For this storm water event a flow meter was used.

May 2, 2011 - Sample collected with the activation of P-005-10 and recycle to the WWTP. Flow estimated based on pump capacity and valve opening.

August 21, 2012 - Sample collected with the activation of P-005-10 and recycle to the WWTP. Flow estimated based on pump capacity and valve opening.



U.S. EPA-REGION 2  
CLEANWATER REGULATORY BR.

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